

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In Re TERRORIST ATTACKS on
SEPTEMBER 11, 2001

)
) 03 MDL 1570 (RCC)
) ECF Case
)

This document relates to:

Estate of O'Neill, et al. v. Republic of Iraq, et al., 04-CV-1076 (RCC)

Declaration of Jerry S. Goldman, Esquire Relating to ECF Filing Error

JERRY S. GOLDMAN, ESQUIRE, on this 20th day of December, 2005, hereby declares pursuant to 28 United States Code Section 1746, and under penalties of perjury, that the foregoing is true and correct:

1. I, am attorney at law, duly admitted to practice before this court, and, along with Gina MacNeill, Esq. and Joshua Ambush, Esq. and others, am attorney of record in the instant matter.
2. I am submitting this Declaration pertaining to technical difficulties I had last evening relative to the filing of a declaration in connection with the above-referenced matter.
3. After we had filed the Memorandum of Law in Opposition to the Rule 11 Motion, and the Declaration of Joshua Ambush, I attempted to file my declaration, and Gina MacNeill attempted to file her declaration.
4. When we filed one of the earlier documents, we did not receive a confirmation, although we found it on the docket thereafter.
5. Similarly, when we filed my declaration and Ms. MacNeill's declaration, we did

not receive a confirmation. I assumed because of the size of the filing, a similar occurrence had taken place. Ms. MacNeill and I filed the declarations at approximately 6:00 P.M.

6. However, when I checked the docket this morning, I learned that it was not docketed. I promptly contacted the clerk and was instructed to re-file, along with this. I was told that it was possibly an issue with 'spread text'.

Jerry S. Goldman, Esquire
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New York, NY. 10006

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